

NORTHERN DISTRICT OF ALABAMA2020 Dec-22 PM 02:58  
U.S. DISTRICT COURT  
N.D. OF ALABAMA

FREDERICK ANTONIO FORD  
PLAINTIFF,  
V.  
LEUTENANT BAKER &  
OFFICER JONES,  
DEFENDANTS

2020 DEC 22 CIVIL Action No. N/A

N.D. OF ALABAMA

4:20-cv-2051-RDP-GMB

JURISDICTION & VENUE  
THIS IS A CIVIL ACTION AUTHORIZED BY 42 U.S.C. SECTION 1983 TO  
REDRESS THE DEPRIVATION, UNDER COLOR OF STATE LAW, OF RIGHTS  
SECURED BY THE CONSTITUTION OF THE UNITED STATES. THE  
COURT HAS JURISDICTION UNDER 28 U.S.C. SECTION 1331 AND 1333  
(1)(A)(3). PLAINTIFF FORD SEEKS DECLARATORY RELIEF PURSUANT IN JUNCTIVE  
28 U.S.C. SECTION 2201 AND 2202. PLAINTIFF FORD SEEK [REDACTED]  
RELIEF [REDACTED] ARE AUTHORIZED BY 28  
U.S.C. SECTION 2283 & 2284 AND RULE 65 OF THE FEDERAL RULES  
OF CIVIL PROCEDURE

APPROPRIATE VENUE THE NORTHERN DISTRICT OF ALABAMA IS AN  
IS WHERE THE VENUE UNDER 28 U.S.C. SECTION 1331(B)(2) BECAUSE IT  
IS WHERE THE EVENTS giving RISE TO THIS CLAIM OCCURRED.

PLAINTIFF  
PLAINTIFF FORD, IS AND WAS AT ALL TIMES MENTION HEREIN  
A PRISONER OF THE STATE OF ALABAMA IN THE CUSTODY OF THE  
ALABAMA DEPARTMENT OF CORRECTIONS. AND IS CURRENTLY CONFINED  
IN [REDACTED] ALABAMA STATE PRISON IN SPRINGVILLE ALABAMA

DEFENDANTS

DEFENDANT: LEUTENANT BAKER IS A SUPERVISOR FOR THE ALABAMA  
DEPARTMENT OF CORRECTION HE IS LEGALLY RESPONSIBLE FOR  
THE OPERATION OF OFFICERS ON HIS SHIFT.

DEFENDANT OFFICER JONES IS A CORRECTIONAL  
OFFICER OF THE ALABAMA DEPARTMENT OF CORRECTIONS WHO AT ALL  
TIMES MENTION IN THIS COMPLAINT, HELD THE RANK OF PRISON GUARD

EACH DEFENDANT IS SUED INDIVIDUALLY  
 AND IN HIS OFFICIAL CAPACITY. AT ALL TIMES MENTIONED IN  
 THIS COMPLAINT, EACH DEFENDANT ACTED UNDER THE COLOR OF  
 STATE LAW.

### Facts.

ON DATE: 12-10-2020 I WAS SCHEDULED TO VISIT INFIRMARY FOR SICK CALL  
 ON THIS SAME EXACT DATE I WENT TO THE INFIRMARY TO  
 VISIT SICK CALL NURSE BECAUSE A RASH HAD OCCURRED ON PRIVATE  
 AREA OF PENIS. THE NURSE ASKED ME TO PULL DOWN PANTS SO  
 SHE CAN REVIEW THE RASH, SHE THEN SEEN THE RASH AND  
 PRESCRIBED ME MEDICATED CREAM AS I WAS PULLING UP MY PANTS  
 AND WENT OUT OF THE DOOR. THE INFIRMARY OFFICER CALLED  
 FOR ME TO COME BACK INSIDE SO I FOLLOWED ORDERS AND CAME  
 BACK INSIDE. HE THEN STATED TO ME TO PUT MY HANDS BEHIND  
 MY BACK SO I CAN BE HANDCUFFED FOR INDECENT EXPOSURE.  
 AS I WAS TRYING TO EXPLAIN TO HIM THAT HE WAS MISTAKEN  
 WHAT TOOK PLACE HE SIAMMED ME TO THE FLOOR AND HANDCUFFED  
 ME TO THE BACK AND CALLED FOR THE OTHER OFFICER'S TO COME  
 HE THEN LIFTED ME OFF THE FLOOR AND EXCORDED ME TO  
 THE UPPER PART OF THE INFIRMARY TO GET BODY CHART  
 AS I WAS SITTED IN THE CHAIR AWAITING BODY CHART  
 (OFFICER JONES AND LUTINATE BAKER) COME INSIDE THE DOOR  
 OFFICER JONES STATED TO ME TO STAND UP SO I STOOD UP  
 WHILE HANDCUFFED BEHIND BACK HE THEN HIT ME IN THE FACE  
 REPEATEDLY. THREW ME ON THE GROUND AND KICKED ME IN THE  
 SHOULDER, FACE AND BACK. MY LIPS WAS BUSTED, SHOULDERS DISLOCATED  
 AND TEETH CHIP. A BODY CHART WAS DONE AND 12-PICTURES WAS TAKEN  
 OF ME. I FEARED FOR MY LIFE AND WAS SCARED SO I TRIED  
 TO KILL MYSELF AND WENT TO A SUICIDE CELL THE SAME EXACT DATE  
 12-10-2020.

### EXHAUSTION OF LEGAL REMEDIES.

THE SAME EXACT DATE THE (WARDEN-BAIDIN) VISIT THE SUICIDE CELL I  
 WAS IN AND ASKED ME TO WRITE A STATEMENT I WROTE  
 A STATEMENT OF FACTS AND GAVE IT TO HIM. INCLUDING  
 EVERYTHING THAT TOOK PLACE BUT NEVER DID RECEIVE JUSTICE.

John Chinn  
DEFENDANT: OFFICER JONES USED EXCESSIVE FORCE AGAINST PLAINTIFF FORD, BY PUNCHING HIM AND KICKING HIM IN THE FACE, SHOULDERS, AND BACK THE ENTIRE TIME PLAINTIFF WAS RESTRAINED IN HANDCUFFS BEHIND BACK WHEN PLAINTIFF FORD WAS NOT VIOLATING ANY PRISON RULE, AND WAS NOT ACTING DISRUPTIVELY. DEFENDANT OFFICER JONES ACTION VIOLATED PLAINTIFF FORD RIGHTS UNDER THE EIGHTH AMENDMENT TO THE UNITED STATES CONSTITUTIONAL AND CAUSED PLAINTIFF [REDACTED] FORD PAIN, SUFFERING, PHYSICAL INJURY AND EMOTIONAL DISTRESS.

BY WITNESSING DEFENDANT JONES ILLEGAL ACTION, FAILING TO CORRECT THAT MISCONDUCT, AND ENCOURAGING THE CONTINUATION OF THE MISCONDUCT, DEFENDANT LEUTENANT BAKER IS ALSO VIOLATING PLAINTIFF FORD RIGHTS UNDER THE EIGHTH AMENDMENT TO THE UNITED STATE CONSTITUTION AND CAUSING PLAINTIFF FORD PAIN, SUFFERING, PHYSICAL INJURY AND EMOTIONAL DISTRESS. PLAINTIFF HAS ALREADY BEEN DIAGNOSED WITH AN (P.T.S.D./STRESS DISORDER) FOR NEARLY 5-YEARS NOW.

### PRAYER FOR RELIEF

WHEREFORE PLAINTIFF RESPECTFULLY PRAY THAT THIS COURT ENTER JUDGMENT GRANTING PLAINTIFF FORD A DECLARATION THAT THE ACTS AND OMISSIONS DESCRIBED HEREIN VIOLATED HIS RIGHTS UNDER THE CONSTITUTION AND LAWS OF THE UNITED STATES, AND A PRELIMINARY AND PERMANENT INJUNCTION ORDERING DEFENDANTS JONES AND BAKER TO CEASE THEIR PHYSICAL VIOLENCE AND THREATS TOWARD PLAINTIFF FORD. AND GRANTING PLAINTIFF FORD COMPENSATORY DAMAGES IN THE AMOUNT OF \$50,000 AGAINST EACH DEFENDANT, JOINTLY AND SEVERALLY.

PUNITIVE DAMAGES IN THE AMOUNT OF \$50,000 AGAINST EACH DEFENDANT, JOINTLY AND SEVERALLY  
GRANTING PLAINTIFF: GUARANTEED PAROLE ON DATE: 12-1-2023

PLAINTIFF ALSO SEEKS A JURY TRIAL ON ALL ISSUES TRIABLE BY JURY  
PLAINTIFF ALSO SEEK RECOVERY OF COST IN THIS SUIT, AND ANY ADDITIONAL

RELIEF

THIS COURT DEEMS JUST, PROPER, AND EQUTABLE.

DATED: 12-17-2020

Respectfully submitted,  
Frederick Antonio Ford  
AIS# 241963  
1000 ST. CLAIR ROAD  
ST. CLAIR CORRECTIONAL FACILITY  
SPRINGVILLE, ALABAMA 35146

VERIFICATION

I HAVE READ THE FOREGOING COMPLAINT AND HEREBY VERIFY  
THAT THE MATTERS ALLEGED THEREIN ARE TRUE, EXCEPT  
AS TO MATTERS ALLEGED ON INFORMATION AND BELIEF, AND  
AS TO THOSE, I BELIEVE THEM TO BE TRUE. I  
CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING  
IS TRUE AND CORRECT.

EXECUTED AT SPRINGVILLE, ALABAMA (12-17-2020)

SIGNATURE: Frederick Ford

NORTHERN DISTRICT OF ALABAMA

FREDERICK Antonio Ford

PLAINTIFF

v.

MOTION FOR  
APPOINTMENT OF COUNSEL

CASE NO. N/A

[REDACTED]  
LEUTENANT - BAKER &  
OFFICER - Co. 4 - JONES.

DEFENDANTS

PLAINTIFF MOVES PURSUANT TO 28 U.S.C. § 1915(E)(1)  
HIM IN THIS CASE. FOR AN ORDER APPOINTING COUNSEL TO REPRESENT  
PLAINTIFF STATES:

(1) PLAINTIFF IS UNABLE TO AFFORD COUNSEL  
HE HAS REQUESTED LEAVE TO PROCEED  
IN FORMA PAUPERIS.

(2) PLAINTIFF IMPRISONMENT WILL GREATLY LIMIT  
HIS ABILITY TO LITIGATE. THE ISSUES INVOLVED IN THIS  
CASE ARE COMPLEX, AND WILL REQUIRE SIGNIFICANT RESEARCH  
AND INVESTIGATION. PLAINTIFF [REDACTED] NO ACCESS TO THE  
LAW LIBRARY AND LIMITED KNOWLEDGE OF THE LAW

(3) A TRIAL IN THIS CASE WILL LIKELY  
INVOLVE CONFLICTING TESTIMONY, AND COUNSEL WOULD BETTER  
ENABLE PLAINTIFF TO PRESENT EVIDENCE AND CROSS  
EXAMINE WITNESSES.

(4) PLAINTIFF HAS MADE REPEATED EFFORTS TO  
OBTAIN A LAWYER BUT DIDN'T GET ANY POSITIVE  
RESULTS.

WHEREFORE, PLAINTIFF REQUESTS THAT THE COURT  
APPOINT A MEMBER OF THE BAR AS COUNSEL IN THIS CASE

12-17-2020

DATE

Frederick Ford  
SIGNATURE

FREDERICK FORD  
PLAINT

1000 ST. CLAIR ROAD, SPRINGVILLE ALABAMA 35146

ADDRESS



NEOPOST  
12/18/2020

POSTAGE \$000 20

POSTAGE ZIP 35146  
0410M1456250

FEDERICK Antonio Ford #19403  
100 St. Clair Road  
St. Clair Correctional Facility  
Springville, Alabama 35146  
**SECURITY**

DEC 22 2020

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA

Garrison N. Heelis  
(CLERK) Room #140  
UNITED STATES COURT HOUSE  
1729 5TH AVENUE NO 274  
1111 BIRDSONG DR BIRMINGHAM AL 35203